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March 25, 2022

By ECF

Hon. Stewart D. Aaron
United States Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED. SO ORDERED.

Dated: March 28, 2022

Att C an

Re: *Clayton Johnson v. City of New York, et al.*, 20 Civ. 5913 (ALC)(SDA)

Dear Judge Aaron:

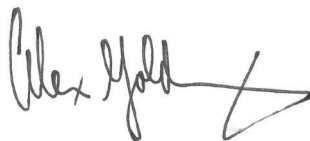
Together with The Jacob D. Fuchsberg Law Firm, LLP, this firm represents plaintiff Clayton Johnson in the above-referenced matter. We write pursuant to the Court's Order of March 7, 2022, directing that the parties provide an update by today regarding whether the parties wish to schedule a second settlement conference or proposing a new discovery schedule.

Since the settlement conference, we have conferred with our client regarding settlement, and also conferred with our client and his defense counsel regarding his ongoing criminal case. At this time, we do not have authority from Mr. Johnson to convey a revised demand or to request a second settlement conference. At the same time, the parties continue to believe that it would be preferable to continue settlement negotiations while conserving both sides' resources and avoiding the unnecessary accrual of fees and expenses through further discovery.

We understand that proceedings in Mr. Johnson's criminal case are going to be a focus of his attention over the next several weeks. We therefore respectfully request a stay of the deadlines in the present case to afford counsel an opportunity to assess where things stand and to confer about resuming settlement talks and/or a reasonable schedule for discovery if settlement negotiations are not possible. To that end, the parties respectfully jointly request that the Court direct the parties to submit a further status update regarding settlement and discovery on or before May 13, 2022, with the current deadlines stayed until that time. We will, of course, inform the Court if there are developments in the interim that require the Court's attention.

We thank Your Honor for your consideration of this letter, and for your willingness to help the parties explore a resolution of the case.

Respectfully Submitted,



Alexander Goldenberg